

00103

1 MS. SHORT: Objection to the form of the
2 question. Assumes he knows who Chamilia's
3 customers are.

4 BY MR. GOGGIN:

5 Q. So, you have had discussions with
6 customers, let's say, not restricted to whether
7 you knew whose customers they were or not, but
8 you've had discussions at these trade shows with
9 customers about Chamilia. Correct?

10 A. Not particularly Chamilia. I've been --
11 I had discussions with a lot of customers, or
12 potential customers, or Pandora customers, or
13 maybe Chamilia.

14 People don't identify themselves.
15 Unless it's a customer of ours, we know it's a
16 customer of ours, and we don't discuss Chamilia.
17 There's no reason to it.

18 So, of course we have talked about the
19 various companies, and there are many, without
20 even having to go into names, because we don't
21 care who they are, and there's coming up new every
22 day, almost. So, our concern is that they cannot
23 carry knock off, who has the same system as
24 Pandora is using.

25 Q. My question is -- I'd like you to tell

00104

1 me whether you had any discussions with anybody at
2 these trade shows, in which you talk about the
3 Chamilia product.

4 A. I don't recall, but --

5 Q. It's possible?

6 A. It's possible.

7 Q. It's likely; isn't it?

8 A. It's likely.

9 Q. Yes. What is it that you tell them
10 about Chamilia?

11 A. That Chamilia is a knock off, and I
12 believe that we have a better looking product,
13 superior product.

14 Q. Okay. What else?

15 A. Basically, that's it.

16 Q. Have you ever told anyone -- let me back
17 up. The same question.

18 Any discussions that you've had not at a
19 trade show, in your normal course of selling these
20 products to customers. Discussions that you had
21 with customers about the Chamilia product.

22 A. Not more than I just told you.

23 Q. I'm talking now about you are talking to
24 your retailers at their retail place of business.

25 You're on the phone --